Fullagar, Jill

From: URBANOWICZ Karla <URBANOWICZ.Karla@deq.state.or.us>
Sent: Monday, August 17, 2015 12:48 PM
To: Hayslip, Gretchen; Fullagar, Jill
Subject: Notes on preview Set 2 of 303d additions
Attachments: removed.txt; EPA Proposed Additions_7-30-15_KUcmts.xlsx

Hi Jill and Gretchen –
Here are a some notes on the second preview set of EPA Proposed Additions_7-30-15.xlsx that included HABs advisories, aquatic weeds, fish and shellfish advisories, Hg in fish, and total phosphorus. I did not look at the other parameters that we reviewed last month and presume that the errors we identified were corrected. Additional comments on specific proposed listings in this second set are added to the EXCEL file.

1) Aquatic Weeds or Algae – Several of the proposed listings are already Cat 5 303d based on harmful algae bloom advisories (See notes on attached file). Some waters with HAB advisories from 2012 to 2014 that are not already listed include these.

HUC 4 Code	HUC 4 Name	Stream/Lake Name	LLID Stream/Lake
17100204	Siletz-Yaquina	Big Creek/Big Creek Reservoir No. 2	1240583446589/1240247446581
17080006	Lower Columbia	Cullaby Lake/Cullaby Lake	1239077460945/1239008460801
17100308	Middle Rogue	Jackson Creek	1229416424128
17090003	Upper Willamette	Long Tom River/Fern Ridge Reservoir	1232400443847/1232915440921
17090012	Lower Willamette	Willamette River (Ross Island Lagoon)	1227618456580

2) Aquatic weeds – DEQ has not used this data for listings before, and I am not familiar with the data source. I presume the links and details from the supporting data for the listings will be provided with the 303(d) addition proposal and more public comment can be made at that time.
3) Columbia Slough has two branches with different LLIDs. Various reaches of the sloughs are operated independently with different engineering controls. Just clarifying that the listing for Aquatic weeds is only for the west slough. See

image.

4) Many of the Hg fish tissue listings are already on 303d list. See notes on EXCEL file.

5) For the soft shell clams advisory listings, probably should have an approximate river mile, along with a note saying about “Anywhere soft shell clams are found.” For same reason, probably should include a listing for Coos

Bay LLID 1243397433543 RM 0 to 12.2 with same note, since the entire bay and the arms that are independently named sloughs are habitat for soft shell clams.

6) Should the Total phosphorus listings have a seasonal time period, rather than be year round? There are chlorophyll a and other parameters that EPA is listing for Summer and FWS season. DEQ's 303d listings and TMDLs have viewed total phosphorus during seasons of Summer and FallWinterSpring when conditions may vary.

7) There are existing approved TMDLs in several subbasins and watersheds that address phosphorus, and these waters are already accounted for in Oregon's Integrated Report as "Cat 4A: Water quality limited, TMDL approved" for phosphorus. The original listings and the TMDLs sometimes have a seasonal time period, not year round. Specific waters with TMDLs for phosphorus include:

   Upper Grande Ronde River Subbasin (17060104) TMDLs - Approved by EPA in May 2000 http://www.deq.state.or.us/WQ/TMDLs/docs/granderondebasin/upgronde/tmdl.pdf for Grande Ronde River

   Tualatin Subbasin TMDLs - Apply to every stream in the subbasin. See 2001 document http://www.deq.state.or.us/wq/tmdls/docs/willamettebasin/tualatin/tmdlwqmp.pdf for load allocations for tributaries (approved August 2001), and amendments http://www.deq.state.or.us/wq/tmdls/docs/willamettebasin/tualatin/revision/Ch2Phosphorus.pdf (approved August 2012), that made changes to waste load allocations for Clean Water Services discharge locations only. Previous listings for Ash Creek, Beaverton Creek, Bronson Creek, Chicken Creek, Dairy Creek, Fanno Creek, Gales Creek, McFee Creek, McKay Creek, Summer Creek, Rock Creek, Tualatin River, Unnamed (Nyberg Creek) 1227381453844 were already de-listed and are all Cat 4a TMDLs approved for phosphorus. Since the TMDLs apply throughout the basin, Dawson Creek is also covered for phosphorus and should be added as a Cat 4 record rather than a Cat 5 listing.

   Columbia Slough TMDLs - Approved by EPA November 1998 – http://www.deq.state.or.us/wq/tmdls/docs/willamettebasin/columbiaslough/tmdl.pdf Phosphorus is discussed on pages 16 -27.
   Check intended branch of Columbia Slough for listing. TMDLs covers both east 1226470455820 and west 1227713456445 branch.

   Bear Creek Watershed TMDL – Approved by EPA December 1992 HUC 1710030801, reviewed in TMDL approved by EPA in October 2007; with TMDLs for phosphorus in Ashland Creek, Bear Creek, and Emigrant Creek http://www.deq.state.or.us/WQ/TMDLs/docs/roguebasin/middlerogue/bearcreek/tmdlchp1sec345.pdf p. 44

   Yamhill River, South Yamhill River, and North Yamhill River – TMDLs approved by EPA in March 1992 http://www.deq.state.or.us/WQ/TMDLs/docs/willamettebasin/Yamhill/YamhillTMDL1992.pdf

   Malheur River Basin TMDL – Lower Malheur (17050117), Upper Malheur (17050116), Willow Creek (17050119), Bully Creek (17050118), and Middle Snake-Payette (17050115) Subbasins/4th Field HUCs. Approved December 2010 TMDLs for phosphorus for summer season to meet basin load allocation developed in the Snake River TMDL although Malheur Basin was not listed for phosphorus at the time of the TMDL development.
   http://www.deq.state.or.us/WQ/TMDLs/docs/malheurriverbasin/MalheurTMDLWQMPFinal.pdf starting p. 6-34.

Additional Oregon TMDL documents are indexed at:
http://www.deq.state.or.us/WQ/TMDLs/basinlist.htm

8) The Umatilla River was previously de-listed for phosphorus in 1998 with this discussion:

"Summer values exceeded proposed phosphorus standard of (0.1 mg/l) with a maximum of 0.240 between WY 1986 - 1995. Development of TMDL and modeling shows that phosphorus is not the limiting constituent. Reduction in water temperature will address pH concerns and TMDL will be based on reducing water temperatures. Initially phosphorous levels were thought to be the factor which was driving the pH violations. A preliminary analysis based on limited data was developed about 10 years ago using the EPA Yellow Book guidance level for phosphorous of .1mg/l. This preliminary analysis was used to originally list the river for nutrients. After further data collection and recent TMDL modeling efforts it was found that temperature was the limiting factor for pH not phosphorous and bringing the water temperature down would bring the pH down. Therefore, phosphorous was removed from the 303(d) list as a water quality limiting factor."

The Umatilla River basin TMDL was approved in May 2001.
http://www.deq.state.or.us/WQ/TMDLs/docs/umatillabasin/umatilla/tmdl.pdf

I did a quick check of the station locations just to see if they conformed to what we have used in the past, and they look OK. I did not check station locations for monitoring sites we do not have in our assessment database at this point.

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